

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Sandra D. Bailey
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Washington, PA 15301

RECEIVED

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Plaintiff

CLERK, U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT
OF PENNSYLVANIA

vs.

Case No.

2:22-CV-1311

NELNET STUDENT LOAN SERVICER, 121 South 13th St, Lincoln, NE 68508

CONDUENT STUDENT LOAN SERVICER (CES) (ACS Education Services) 2277 East 220th St, Long Beach, CA 90810

Defendant(s)

COMPLAINT

- I. The plaintiff is a resident of Washington, Washington County, Pennsylvania and a citizen of the United States.
- II. The defendant, Nelnet Student Loan Servicer, is a resident of 121 South 13th St, Lincoln NE 68508 and a citizen of the United States.
- III. The defendant, CONDUENT STUDENT LOAN SERVICER (CES) (ACS Education Services), 2277 East 220th St, Long Beach, CA 90810, is a resident of Long Beach, CA and a citizen of the United States.

JURISDICTION

- IV. This court has jurisdiction over this matter pursuant to Disputes between parties from different states.

FACTS

- V. FEDERAL STUDENT AID LOAN (FSAL) COUNT INCORRECT IN FSAL DATABASE:

IS: 17 FSAL – **ORIGINAL LOAN VALUE** \$168,092.00

SHOULD BE: 1 CONSOLIDATED LOAN 2007 - TOTAL 14 GRADUATE LOANS CONSOLIDATED BY
ACS 2007 - **ORIGINAL LOAN VALUE** \$110,437.00

VI. **ORIGINAL VALUE OF FEDERAL STUDENT AID LOAN INCORRECT IN FSAL DATABASE:**

IS: \$168,092.00

SHOULD BE: \$110,437.00 – 2007 ACS FSAL 14 LOAN CONSOLIDATION

VII. **VERBIAGE OF FEDERAL STUDENT AID LOANS IN NATIONAL STUDENT LOAN DATABASE (NSLD)/FSAL INCORRECT:**

IS: UNDERGRADUATE AND GRADUATE VERBIAGE

SHOULD BE: GRADUATE ONLY VERBIAGE

UNDERGRADUATE DEGREE PAID FOR THROUGH AIR FORCE VA EDUCATION BENEFIT

RELIEF

VIII. I am demanding the original loan value is returned to \$110,437.00 from \$168,092.00; the fraudulent addition of 3 loans 15, 16, 17 removed from Federal Student Aid Loan database; NELNET remove the fraudulent undergraduate verbiage entered into the NSLD/FSAL database.

IX. I am demanding NELNET pay me \$10,000,000 dollars (ten million dollars) for the charges of fraud committed against me by reporting fraudulent information to Federal Government agencies, regarding my federal student loans.

X. I am demanding the Federal Student Aid Loans be cancelled/closed/forgiven due to fraud.

DAMAGES

XI. In 2017 Nelnet acquired my FSAL. Three fraudulent loans, 15, 16, 17 were added to my Federal Student Aid Loans; the original value of the Federal Student Aid loans increased from \$110,437.00 to \$168,092.00; NELNET added fraudulent undergraduate verbiage, to the NSLD and reversed the order of the information in the NSLD 08/11/2022.

ADDITIONAL INFO

I was enrolled in a PhD Program at Capella University 2002 - 2006

2005/2006 Republican Congress capped FSAL at \$100,000.00

Had to withdraw from PhD program 08/2006 due to lack of financial funding, FSAL was at \$98,938.00

Two Great Lakes FSAL Cancelled 06/25/2006 – never distributed, \$0 dollar value, cancelled

14 FSA Graduate loans (4 ACS, 10 Navient) consolidated in 2007 by ACS for an original loan value of \$110,437.00.

From 2006 forward I was no longer eligible for FSAL because of the 2005/2006 Congressional cap of \$100,000.00 on FSAL.

2000-2017 FSAL/NSLD reporting correct/stable

2017 Nelnet acquires my FSAL adds 3 new loans, 15, 16, 17 and changes the original value of the loan from \$110,437.00 to 168,092.00; 2022 Nelnet adds undergraduate verbiage to NSLD reverses order

There is no 15, 16, 17 loan, impossible, no longer eligible for FSAL after 2006 – 14 loans consolidated 2007 – no education loans after the ACS 2007 consolidation – not eligible due to Congressional \$100,000.00 cap on FSAL's 2005/2006.

Impossible to increase original FSAL value \$110,437.00 - original value is original value established 2007 when the 14 loans (4 ACS, 10 Navient) were consolidated 2007 by ACS

I have been trying to resolve the inaccuracies in the FSAL/NSLD since 2017 with Nelnet and the Department of Education – to no avail.



Signature of pro se Plaintiff

09-10-2022

Date